

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Angela V. Dudley) Case No. 17-16967
) Chapter 13 Proceedings
Debtor.) Judge Jessica E. Price Smith

**CHAPTER 13 TRUSTEE'S OBJECTION TO DEBTOR'S
MODIFIED PLAN**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, by and through counsel, and hereby objects to the Debtor's Modified Plan filed with this Court on December 1, 2017 (hereinafter "Debtor's Modified Plan"). In support of her objection, the Trustee makes the following representations to the Court:

1. The Debtor's 341 hearing is scheduled for January 10, 2018. The Trustee cannot determine if the requirements under Section 1325 of the Bankruptcy Code have been met until after the 341 hearing is held.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Modified Plan for the reasons cited.

Respectfully submitted,

/S/ Holly Dvala
HOLLY DAVALA (#0070447)
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CERTIFICATE OF SERVICE

I certify that on December 18, 2017, a true and correct copy of Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Whitney Kaster, Attorney, on behalf of Debtor, at wkaster@dannlaw.com

And by regular U.S. mail, postage prepaid, on:

Angela V. Dudley, Debtor at 23818 Rushmore Drive, Cleveland, OH 44143

/S/ Holly Davala

HOLLY DAVALA (#0070447)
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